

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

Case No. 1:24-mj-00134 (CFH)

U.S. DISTRICT COURT – N.D. OF N.Y.

FILED

KRISTIN KEEBLE, aka "Betty Belk,"

Defendant.

Mar 08 - 2024

John M. Domurad, Clerk

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

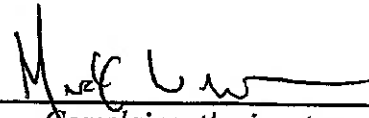
On or about the date(s) of October 26, 2023, in the county of Greene in the Northern District of New York the defendant(s) violated:

*Code Section*  
18 U.S.C. § 875(c)

*Offense Description*  
Interstate Communication with Threat to Injure

This criminal complaint is based on these facts:  
See attached affidavit.

☒ Continued on the attached sheet.



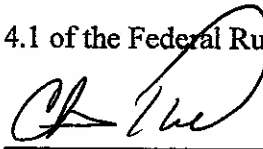
Complainant's signature

Mark Wilson, FBI Task Force Officer

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: March 8, 2024



Judge's signature

City and State: Albany, NY

Hon. Christian F. Hummel, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, **Mark Wilson**, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I have been an Investigator of the New York State Police (NYSP) for over five years. Since January of 2023, I have been assigned to the Federal Bureau of Investigation's Joint Terrorism Task Force (JTTF) of the Albany Field Office, where, among other things, I am responsible for conducting national security and threat investigations of potential violations of federal criminal law. Prior to that assignment I served over three and a half years on the Counter Terrorism Center at the New York State Intelligence Center (NYSIC).

2. Over the course of my time as an Investigator and Task Force Officer, I have received training in criminal investigations, including domestic terrorism and threats, federal law pertaining to those offenses, report writing, surveillance, and undercover operations. During my tenure with the NYSP and FBI, I have participated in numerous investigations during which I have conducted surveillance, executed search warrants, and reviewed and analyzed recorded electronic communications and conversations and records of individuals engaged in conspiring to commit acts of terrorism and making threats to other individuals.

3. Members of the FBI also have extensive experience in terrorism and threat investigations, including individuals with an expressed ideology that motivates acts of terrorism and threats. I have had many informal exchanges with members of the FBI along with other law enforcement officers. Through my training, education, and experience, I have become familiar with the way individuals make threats over the internet, including on social media platforms, how

they operate, and the efforts of persons involved in such activities to avoid detection by law enforcement.

4. I make this affidavit in support of a criminal complaint charging Kristin KEEBLE with knowingly sending a message in interstate commerce containing a true threat to injure the person of another, in violation of Title 18, United States Code, Section 875(c).

5. The statements contained in this affidavit are based upon my investigation, information provided by other law enforcement officers, and my experience and training. As this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that KEEBLE has violated Title 18, United States Code, Sections 875(c).

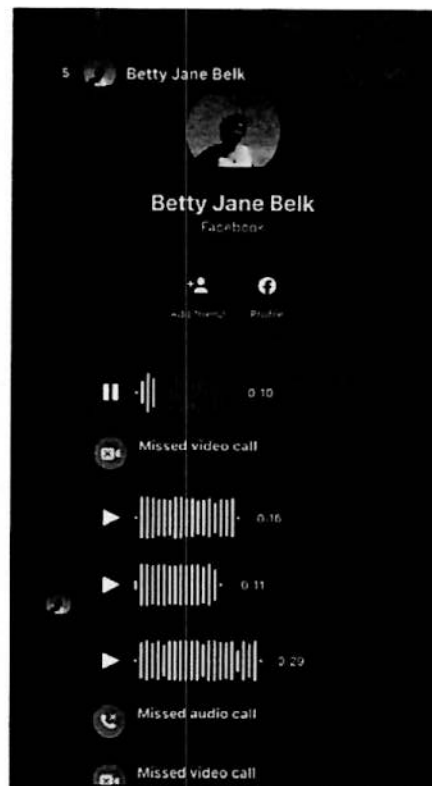
#### **PROBABLE CAUSE**

##### **Threats Made by Facebook User "Betty Belk" on October 26, 2023**

6. In December 2023, a complainant and victim with initials S.B., a resident of Catskill, New York, reported the following to the FBI:

- a. On November 11, 2023, S.B. logged in to his Facebook account and discovered four Facebook voice messages, two missed video calls, and one missed audio call, each dated October 26, 2023, that had been left by the Facebook user with vanity name "Betty Jane Belk" with URL <https://www.facebook.com/mental.case.98478> ("Belk Facebook Account").

- b. S.B. stated that he did not know the user of the Belk Facebook Account personally, and had not met in person, but knew that the Belk Facebook Account had posted in a common Facebook group, where S.B. had also commented.
- c. S.B.'s personal Facebook profile is publicly viewable and contains a photograph of himself, a Black male, and a White female, who S.B. stated was a friend.
- d. A screenshot of the Facebook Messenger log that S.B. received from the Belk Facebook Account is seen below:



- e. The first audio message, which lasted approximately 10 seconds, stated the following: "Hey you fucking nigger! Quit fucking with people on the Internet

before we hang your fucking monkey motherfucking ass by your black fucking African balls you fucking nigger fucking bitch.”

- f. The second audio message, which lasted approximately 16 seconds, stated the following: “Messing with that poor girl on that post you fucking African fucking fuck. Are you here illegally motherfucker? Just wait till Trump comes back. We’re gonna have you deported to your African fucking jungle you monkey scratching ball fucking black motherfucker.”
- g. The third audio message, which lasted approximately 11 seconds, stated the following: “Inbred ass fucking nigger fucking that fat fucking white bitch we’re gonna hang that fucking whore from the tree too with you bitch and your nigger fucking mixed kids.”
- h. The fourth audio message, which lasted approximately 29 seconds, stated the following: “You better watch who the fuck you fucking with up on these motherfuckers you know us Klan members run deep bitch and we protect our fucking White women, not that fat White bitch you’re with, but we protect other motherfuckers on Facebook from African fucking monkeys like you. Who you gonna call CPS on bitch? I’ll call my goddamn grand Ku Klux Klan motherfucker, top for the fucking trees bitch comedown on your fucking African fucking head motherfucker.”
- i. When he received these messages from the user of the Belk Facebook Account, S.B. felt threatened and feared for his own safety as well as the safety of his friend, the White female depicted in his Facebook profile to which the user of the Belk

Facebook Account referred. S.B. believed that in the third audio message, the user of the Belk Facebook Account threatened to injure or kill him and his White female friend by hanging or lynching them both from a tree. S.B. also believed that the user of Belk Facebook Account intended to hurt children associated with S.B.

7. In my training and experience, I believe that the user of the Belk Facebook Account knowingly sent a message to S.B. containing a threat to injure S.B. and his friend and other children. In my training and experience, a reasonable person would have understood the messages sent by the Belk Facebook Account to communicate a serious expression of an intent to do harm.

**Facebook Records Show IP Address and Attribution to Keeble**

8. On December 13, 2023, the U.S. District Court for the Northern District of New York issued a warrant authorizing a search of the Belk Facebook Account. Records from Meta Platforms, Inc. show that there were logins to the Belk Facebook Account on October 26, 2023, at the relevant times when the threatening voicemails were sent, from IP Address 168.220.160.175.

9. Meta records also indicate that the same cookie had logged into other Facebook accounts, including Facebook Account with User ID 100066073226521 with vanity name “Kris Lerma” (“Lerma Facebook Account”).

10. On the public profile of the Lerma Facebook Account, law enforcement has observed a profile photograph consistent with the description for Kristin Keeble known to law enforcement. Additionally, on August 16, 2022, the user of the Lerma Facebook Account posted a message in which the user identifies her birthday as August 18, and refers to going shopping with “Sierrah.” Based on law enforcement records, August 18 is the known birthday for Kristin Keeble, and she is known to have a daughter named “Sierrah.”

11. Meta records show that the Lerma Facebook Account had a login from IP address 168.220.160.175 on October 26, 2023.

**IP Address Associated with Threat Traces to Keeble's Premises in South Carolina**

12. Records from RiverNet Connect, a telecommunications provider, show that IP address 168.220.160.175 on October 26, 2023, and November 15, 2023, is associated with subscriber "Kristin Keeble" located on Crowburk Road, in Pageland, South Carolina ("Crowburk Residence"). RiverNet records show that the account had been receiving service since October 25, 2022.

13. On March 5, 2024, FBI personnel conducted surveillance at the Crowburk Residence and observed Kristin Keeble.

**Chesterfield County Sheriff's Office Identify Keeble's Voice on Threatening Message**

14. On January 30, 2024, I conducted an interview of Sergeant Larry Tucker of the Chesterfield County Sheriff's Office (CCSO) Narcotics Division in Chesterfield, South Carolina. Sgt. Tucker advised that he was familiar with Kristin Keeble from a prior police contact and that he had previously heard Keeble make racial/ethnic slurs. When provided with the audio recording from the Belk Facebook Account for voice recognition, Sgt. Tucker identified the voice from the Belk Facebook Account voicemail dated October 26, 2023, as Kristin Keeble and stated that he had a high degree of confidence that it was Keeble.

15. On January 30, 2024, I conducted an interview of CCSO Deputy Cody Robinson. Deputy Robinson advised that he was familiar with Kristin Keeble from a prior police contact. When provided with the audio recording from the Belk Facebook Account for voice recognition,

Deputy Robinson identified the voice from the Belk Facebook Account voicemail dated October 26, 2023, as Kristin Keeble and stated that he had a high degree of confidence that it was Keeble.

**CONCLUSION**

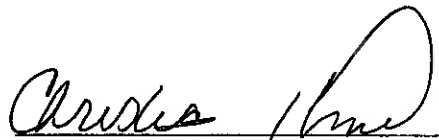
16. Based upon the above information, there is probable cause to conclude that on October 26, 2023, in Greene County, in the Northern District of New York, and elsewhere, Kristin KEEBLE violated Title 18, United States Code, Sections 875(c) which prohibits knowingly sending a message in interstate commerce containing a true threat to injure the person of another.

Attested to by the affiant:



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Mark Wilson  
Task Force Officer  
Federal Bureau of Investigation

I, the Hon. Christian F. Hummel, United States Magistrate Judge, hereby acknowledge that, on March 8, 2024, this affidavit was attested by the affiant by telephone on in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.



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Hon. Christian F. Hummel  
United States Magistrate Judge